

LISKOW & LEWIS

A PROFESSIONAL LAW CORPORATION

ATTORNEYS AT LAW

ONE SHELL SQUARE
701 POYDRAS STREET, SUITE 5000
NEW ORLEANS, LOUISIANA 70139-5099

TELEPHONE (504) 581-7979
FACSIMILE (504) 558-4108 • (504) 558-4109

822 HARDING STREET
P.O. BOX 52008
LAFAYETTE, LOUISIANA 70505-2008
TELEPHONE (337) 232-7424
FACSIMILE (337) 287-2399

FIRM@LSKOW.COM
WWW.LSKOW.COM

Lafayette, Louisiana
January 15, 2004

CULLEN R. LISKOW (1983-1971)
AUSTIN W. LEWIS (1910-1974)

CAROL WELBORN REISMAN
MATT JONES
DAVID L. REISMAN
JILL THOMPSON LOSCH
MICHAEL D. RUBENSTEIN
HAROLD J. FLANAGAN
GREG L. JOHNSON
JAMIE D. RHYMES
CHRISTINA DELUNA MILLER
BRETT D. WISE
KYLE P. POLOZOLA
MARY C. HESTER †
THOMAS BERON
J. PATRICK MORRIS, JR.
E. JANE ROLLING
MARK A. JOHNSON
ELISE MAYERS BOUCHNER
JANA L. GRAUBERGER
SHAWN C. RHYMES
K. TODD WALLACE
MAURY C. HEBERT
MICHAEL A. GOLEMI
JANINE V. HODGES
JASON P. BERGERON
CHADWICK J. MOLLIERE •

KELLY T. SCALISE
DANA M. DOUGLAS
NATHAN S. ABERNOMBIE
H.S. BARTLETT III
JAMES H. DUPUIS, JR.
KELLY BRECHTEL BECKER
RENEE ZEPHUNGUE BERARD
AMY E. ALLUMS
DEBORAH MCROCKLIN
CAREY C. LYON
NANCY BRECHTEL
NICOLE E. FRANCIS
JESSICA TURNER GACHASSIN

Of Counsel
CHARLES C. GREMILLION
THOMAS D. HARDEMAN
THOMAS S. LEMANN

† Board Certified Estate Planning
and Administration Specialist
• Board Certified Tax Specialist
♦ Registered Patent Attorney

GENE W. LAPITTE
LEON J. REYMOND, JR.
J. BERRY ST. JOHN, JR.
DONALD R. ABALINZA
JOHN M. WILSON
LAWRENCE P. SIMON, JR.
S. GENE FENDLER
JOHN D. WOGAN
MAURICE C. HEBERT, JR.
GEORGE H. ROBINSON, JR.
MARILYN C. MALONEY
JOSEPH C. GIGLIO, JR.
PATRICK W. GRAY
ROBERT E. HOLDEN
JOE B. NORMAN
THOMAS M. MONAMARA
JAMES N. MANSFIELD III
BILLY J. DOMINGUE
PHILIP K. JONES, JR.
WILLIAM W. PUGH
RICHARD W. REVELS, JR.
JOSEPH P. HEBERT
MARGUERITE L. ADAMS †
DAVID W. LEEPE
WM. BLAKE BENNETT

MARK A. LOWE
GEORGE DENEGRE, JR.
DON K. HAYCRAFT
CRAG WYMAN
JAMES A. BROWN
R. KEITH JARRETT
STEVIA M. WALTHER
BRIAN A. JACKSON
ROBERT S. ANGELICO •
ROBERT L. THERIOT
DENA L. OLIVER
GEORGE AROBENEAUX III
RANDY C. SNYDER
JONATHAN A. HUNTER
THOMAS P. DIAZ
MARY S. JOHNSON
SHAUN G. CLARKE
JAMES C. EDWARDS •
THOMAS J. MCGOHEY II
SCOTT O. SEILER
CHERYL MOLLIERE KORNICK
MARK D. LATHAM
JOHN C. ANJER
G. C. SLAWSON, JR.
SHANNON S. HOLTZMAN

Honorable James H. Welsh
Commissioner of Conservation
Office of Conservation
Post Office Box 94275
Baton Rouge, LA 70804-4275

Re: Pettit Zone, Sand Unit C
Spider Field
DeSoto Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **BP AMERICA PRODUCTION COMPANY** for the calling of a public hearing, after ten (10) days legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the Pettit Zone, in the Spider Field, DeSoto Parish, Louisiana, for which rules and regulations were established and drilling and production units were created for the exploration for and production of gas and condensate by Office of Conservation Order No. 92-A, as amended and supplemented by the 92-A Series of Office of Conservation Orders, including the unit designated PET SUC:

1. To permit the applicant to drill, designate and utilize its DeSoto Properties No. 2 Well as substitute unit well for the PET SUC, said well located as shown on the plat attached hereto, in exception to the spacing provisions of Office of Conservation Order No. 92-A, effective February 25, 1948.
2. To find that the proposed substitute unit well at the location shown on the attached plat is necessary to efficiently and economically drain a portion of the reservoir covered by the unit in which it is situated which cannot be so drained by any existing well within such unit.
3. Except to the extent contrary herewith, to continue in full force and effect the provisions of Office of Conservation 92-A, as amended and supplemented by the 92-A Series of Office of Conservation Orders, the units created thereby, and applicable Statewide Orders.
4. To consider such other matters as may be pertinent.

January 15, 2004

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Page 2

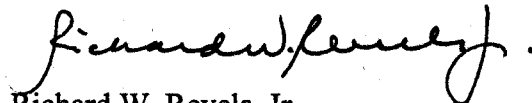
The Pettit Zone, in Spider Field, DeSoto Parish, Louisiana, was defined in Office of Conservation Order No. 92-A, effective February 25, 1948.

The existing unit well has gone off production and has been plugged and abandoned. The applicant is therefore requesting permission to drill, designate and utilize its DeSoto Properties No. 2 Well as substitute unit well for the PET SUC, in exception to the spacing provisions of the Office of Conservation Order No. 92-A, effective February 25, 1948.

Attached hereto and made a part hereof is a plat outlining the applicant's proposal and a list of the names and addresses of the Interested Owners, Represented Parties and Interested Parties to whom a copy of this application is being sent. Pursuant to the Revised Rules of Procedure, the list of parties is being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties.

Finally, enclosed is our check on behalf of the applicant in the amount of \$755.00 made payable to the Office of Conservation and representing the required hearing application fee.

Very truly yours,



Richard W. Revels, Jr.

RWRjr/dbf
Enclosures

cc: Mr. James Broussard, Shreveport District Office of Conservation
cc: Interested Owners, Represented Parties and Interested Parties

113640_1.DOC
10455.0132

R 14 W

PET SU

20

21

19

PET SU E

30

PET SU C

29

PET SU D

28

T 12 N

PET SU B

32

PET SU

33

31

6

PET SU

T 11 N

LEGEND

- - Unit Well
- △ - Proposed Substitute Unit Well
- - - - - Pettit Units As Per 92-A Series Of Orders

EXHIBIT NO.

DOCKET NO. 04-

BP AMERICA PRODUCTION COMPANY

Houston, Texas

SPIDER FIELD

DeSoto Parish, Louisiana

Substitute Unit Well Plat

PET SU C

0' 1000' 2000' 4000'

LOUIS GILBERT & ASSOCIATES, INC.

DOCKET NO. 04-

BP AMERICA PRODUCTION COMPANY

Houston, Texas

SPIDER FIELD

DeSoto Parish, Louisiana

Substitute Unit Well Plat

PET SU C

A horizontal graphic scale bar with tick marks at 0, 1000, 2000, and 4000 feet. The text '0', '1000'', '2000'', and '4000'' is placed above the corresponding tick marks.

LOUIS GILBERT & ASSOCIATES, INC.

LEGEND

○ - Unit Well
△ - Proposed Substitute Unit Well

- Pettit Units As Per 92-A Series Of Orders

**NOTE: WELLS 4500' OR SHALLOWER
REMOVED FROM MAP**